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February 3, 2022

BY ECF

Honorable Naomi Reice Buchwald
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Dalaeja Foreman & Bryant Aracena v. Metropolitan Transportation Authority, et al.*, 21 Civ. 3774 (NRB)

Your Honor:

Plaintiffs in the above-referenced action respectfully request leave to file a Second Amended Complaint in order to name a newly-identified individual (MTA P.O. Darnell Lewis) as a defendant. Both sets of defendants consent to this application. The proposed amended complaint is attached for the Court's convenience.

Thank you for your consideration of this request.

Respectfully,

/s

Rose M. Weber (RW 0515)

cc: Jeffrey Frank, Esq. (by ECF)
Helene Hechtkopf, Esq. (by ECF)
Steven Silverberg, Esq. (by ECF)